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**Pro hac vice* admittance to be sought

Counsel for Plaintiff and the Proposed Putative Class

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

SAMANTHA ELLISON, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

MYLIFE.COM, INC., a Delaware
corporation,

Defendant.

Case No.

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

1 Plaintiff Samantha Ellison (“Plaintiff”), individually and on behalf of all others similarly
 2 situated, by and through her counsel, brings this Class Action Complaint against Defendant
 3 MyLife.com, Inc. (“MyLife”), and alleges as follows upon personal knowledge as to herself and
 4 her own acts and experiences, and, as to all other matters, upon information and belief, including
 5 investigation conducted by her attorneys.

6 **I. NATURE OF THE ACTION**

7 1. In 2004, The California Legislature enacted Cal. Bus. & Prof. Code § 17529 *et al.*
 8 (the “California Anti-Spam Law” or the “Anti-Spam Law”) in response to the increasing
 9 problem of unsolicited commercial email advertisements. In so doing, the Legislature declared
 10 these “spam” emails to be more than simply an annoyance, but “a drain on corporate budgets and
 11 possibly a threat to the continued usefulness of the most successful tool of the computer age.”¹

12 2. At the time of the Anti-Spam Law’s enactment, Ferris Research, Inc., a San
 13 Francisco consulting group, determined that spam would cost United States organizations more
 14 than ten billion dollars (\$10,000,000,000) in that year alone in the form of lost productivity, as
 15 well as additional equipment, software, and manpower required to combat the problem.² Yet, the
 16 creation and initiation of email spam is relatively simple and inexpensive.

17 3. The California Anti-Spam Law is intended to address this issue, making it
 18 unlawful for any person or entity to advertise in a commercial email advertisement if the
 19 advertisement has a subject line that the person or entity “knows would be likely to mislead a
 20 recipient, acting reasonably under the circumstances, about a material fact regarding the contents
 21 or subject matter of the message.”³

22 4. MyLife.com is a popular social networking website developed to combat what the
 23 company has dubbed “social media overload.”⁴ For those consumers who have difficulty
 24 juggling various social networking and email accounts, Mylife offers a single platform to access

25
 26 ¹ Cal. Bus. & Prof. Code § 17529(b).

² Cal. Bus. & Prof. Code § 17529(d).

³ Cal. Bus. & Prof. Code § 17529.5(a)(3).

⁴ MyLife, <http://www.mylife.com/blog/social-media-overload/> (last visited April 4, 2014).

1 and manage these online profiles, and claims to be “the one place you need to make valuable
2 personal and professional connections, plus pull together your social and email communications
3 to help simplify your life.”⁵

4 5. As a marketing ploy, MyLife sends consumers unsolicited commercial email
5 advertisements *en masse*, with subject lines that often misrepresent the actual content or subject
6 matter of the email. In many instances, the tone and wording of the subject lines create the
7 appearance that the emails were sent as an invitation to connect online with a MyLife user, or
8 relate to a security breach that exposed the recipient’s personal identification information (*e.g.*
9 personal passwords or social security numbers) to the general public.

10 6. These slickly-crafted subject lines, however, bear no reasonable connection to the
11 subject matter of the message, which is actually nothing more than an advertisement for MyLife.
12 By sending these spam emails under the guise of personal, professional, or otherwise important
13 correspondence, MyLife prevents consumers from properly identifying and discarding these
14 message, and tricks them into viewing the enclosed advertisements – the exact type of deception
15 the California Anti-Spam Law sought to eliminate.

16 7. Plaintiff makes no claim or allegation as to the truth or falsity of the information
17 included in the text, or body, of these unsolicited email advertisements. Rather, Plaintiff alleges
18 that the subject lines misrepresent the actual content or subject matter of the messages in
19 violation of California law, which is what the California Anti-Spam Law addresses.

20 8. Accordingly, as a result of Defendant’s conduct as described herein, Plaintiff
21 seeks relief on behalf of herself and all others similarly situated (the “Class,” as defined below),
22 for violations of the California Anti-Spam Law, Cal. Bus. Prof. Code § 17529 *et al.*

23 **II. JURISDICTION AND VENUE**

24 9. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332(d)(2). In the
25 aggregate, Plaintiff’s claims and the claims of the other members of the Class exceed \$5,000,000
26

27 ⁵ MyLife, <http://www.mylife.com/about-us/> (last visited April 4, 2014).

1 exclusive of interest and costs, and there are numerous class members who are citizens of states
2 other than the State of California, where Defendant's principal offices are located.

3 10. This Court has personal jurisdiction over Defendant because Defendant is
4 authorized to and conducts substantial business in California, with its principal offices located in
5 California. Defendant is registered in and operates out of California, and causes commercial
6 email messages to be sent from California.

7 11. Venue is proper in this Judicial District pursuant to 28 U.S.C. §§ 1391(b)(1), (2),
8 and 1391(c) because Defendant is deemed to reside in this District and is subject to personal
9 jurisdiction here; a substantial part of the events giving rise to the claims emanated from
10 activities within this District; and Defendant conducts substantial business in this district.

11 **III. PARTIES**

12 ***Plaintiff***

13 12. Plaintiff Samantha Ellison is a natural person and citizen of the State of Illinois.

14 13. Plaintiff has received numerous unsolicited commercial email advertisements
15 from MyLife, all of which include subject lines that misrepresent one or more material facts
16 regarding the contents or subject matter of the emails. These communications are further detailed
17 below.

18 14. To the best of her knowledge, Plaintiff has never subscribed to, contacted, or
19 requested advertising or product information from MyLife, or any of its affiliates, subsidiaries, or
20 associated entities.

21 ***Defendant***

22 15. MyLife is a Delaware corporation headquartered at 1100 Glendon Avenue, Suite
23 1800, Los Angeles, CA 90024. On information and belief, MyLife operates a popular social
24 networking website with over 60 million users.⁶

25
26
27 ⁶ MyLife, <http://www.mylife.com/about-us/> (last visited April 4, 2014).

IV. FACTUAL BACKGROUND

16. According to its website, MyLife enables users to “manage communication across the most popular social networks and email accounts securely and conveniently on one simple dashboard.”⁷ Its service purports to streamline social networking and online correspondence by offering a single profile through which consumers can access and manage all of their existing online accounts, provided by unaffiliated third-parties such as Twitter, Facebook, and Google.

17. Rather than offering consumers a new, alternative social networking forum, MyLife merely offers a platform to manage services to which the consumer already has access through third-party providers. As many people are presumably reluctant or unwilling to pay a monthly fee simply to manage already-accessible social networking services – most of which are available free-of-charge – MyLife sends hundreds of thousands, if not millions, of unsolicited spam emails in an attempt to spark consumer interest.

18. In recent years, however, both spam filters and consumers have become more adept at recognizing email spam, which has significantly hampered the effectiveness of these messages as a means of advertising products and services. Since the vast majority of spam emails are now identified and discarded before the recipient opens, or even views the message, companies such as MyLife have resorted to sending unsolicited commercial emails that feature cleverly-worded subject lines designed to disguise the true nature of the message. Typically, these subject lines will imply that the message was sent at the behest of a personal or professional acquaintance, or involve an urgent matter specific to the *recipient’s* well-being.

19. For example, as depicted in Exhibit A, Plaintiff received an email with the subject line “26-year old female viewed your public info.” A reasonable consumer would conclude (as Plaintiff did) that the message was sent either: (1) from a MyLife account holder who had searched for the recipient; or (2) in response to a security breach that left the recipient’s personal identification information (*e.g.* her social security number or personal passwords) exposed to the

⁷ *Id.*

1 general public.⁸ The message, however, makes no reference to a 26-year-old female and includes
2 only advertisements for unrelated products and services. Thus, the subject line tricks the
3 recipient into opening and viewing an advertisement that the recipient would otherwise have
4 identified and discarded as spam.

5 20. In a rather transparent attempt to circumvent liability under federal and state anti-
6 spam laws, MyLife will sometimes establish a superficial connection between the topics
7 broached in the subject line and the message itself. For example, as depicted in Exhibit D,
8 Plaintiff received an email with the subject line “A 26-year old Female viewed your public info;
9 a matter of life and death.” A reasonable consumer would interpret this subject line as
10 communicating an urgent message *specific* to the recipient, but the email’s only reference to a
11 “matter of life and death” is an apparent advertisement for MyLife entitled: “Finding Mom—A
12 Matter of Life and Death.”

13 21. Merely referencing the same language in the subject line and message fails to
14 absolve MyLife of liability for its conduct. If the subject line invokes an urgency completely
15 absent from the message itself, then the recipient has been misled as to the subject matter or
16 content of the email – regardless of the extent to which the subject line and message are
17 “technically” related.

18 22. Moreover, even if the articles in the message *were* logically and contextually
19 related to the topics in the subject line, those topics still have the potential to mislead if they
20 disguise the commercial nature of the message and prevent the recipient from recognizing the
21 email for what it really is: an advertisement.

22 23. On February 26, 2014, Plaintiff received the first of several spam emails from
23 MyLife (Attached hereto as Exhibit A), entitled: “**A 26-year old female viewed your public**
24 **info.**” The message of the email, however, makes no specific reference to a “26-year old
25

26 ⁸ While the subject of line of this particular email does say the person has viewed your “*public*”
27 information, at first glance, any reasonable recipient would interpret the subject line as communicating a security or
28 privacy warning, prompting the recipient to email the message and view its contents.

1 female,” and includes only unrelated headings and advertisements. Moreover, by its wording and
2 connotation, the subject line misrepresents the actual subject matter of the message by appearing
3 as though it involves a security warning *specific* to Plaintiff, rather than an advertisement for
4 MyLife.

5 24. On March 6, 2014, Plaintiff received a second spam email from MyLife (Attached
6 hereto as Exhibit B), entitled: **“6 people are tracking you online; keeping kids safe on the
7 internet.”** While the message references various unidentified individuals who were supposedly
8 “viewing [Plaintiff’s] Public Info,” it makes no reference to the “6 people” or the ominous
9 “tracking” warned of in the subject line. Moreover, by its wording and connotation, the subject
10 line misrepresents the actual subject matter of the message by appearing as though it involves a
11 security warning *specific* to Plaintiff, rather than an advertisement for MyLife.

12 25. On March 13, 2014, Plaintiff received a third email from MyLife (Attached hereto
13 as Exhibit C), entitled: **“6 people are viewed your public info; Your address and email are
14 exposed; what does your selfie say about you.”** The corresponding message makes no specific
15 reference to the “6 people” who supposedly viewed Plaintiff’s public information, and includes
16 only unrelated headings and articles either tenuously connected, or completely unrelated to the
17 subject line. Moreover, by its wording and connotation, the subject line misrepresents the actual
18 subject matter of the message by appearing as though it involves a security warning *specific* to
19 Plaintiff, rather than an advertisement for MyLife.

20 26. In perhaps its boldest misrepresentation, MyLife sent a fourth unsolicited spam
21 email to Plaintiff on March 20, 2011 (Attached hereto as Exhibit D), entitled: **“A 26-year old
22 Female viewed your public info; a matter of life and death.”** The corresponding message
23 makes no reference to a 26-year-old female, and the “matter of life and death” apparently refers
24 to an *advertisement* touting MyLife’s success at reuniting a pair of adopted sisters with their
25 biological mother. Moreover, by its wording and connotation, the subject line misrepresents the
26
27
28

1 actual subject matter of the message by appearing as though it involves a security warning
2 *specific* to Plaintiff, rather than an advertisement for MyLife.

3 27. On March 27, Plaintiff received a fifth email from MyLife (Attached hereto as
4 Exhibit E), entitled: “**A 26-year old Female viewed your public info; baby left at the**
5 **hospital.**” The corresponding message makes no reference to a 26-year-old female and includes
6 only a MyLife Advertisement describing a user’s search for his or her biological mother after
7 being abandoned at birth. Moreover, by its wording and connotation, the subject line
8 misrepresents the actual subject matter of the message by appearing as though it involves a
9 security warning *specific* to Plaintiff, rather than an advertisement for MyLife.

10 28. All of the above-referenced emails include subject lines that misrepresent one or
11 more material facts concerning the content or subject matter of the message.

12 **V. CLASS ACTION ALLEGATIONS**

13 29. Plaintiff brings Count I, as set forth below, on behalf of herself and as a class
14 action, pursuant to the provisions of Rules 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil
15 Procedure on behalf of a class defined as:

16 All persons in the United States who, from December 15, 2013 to
17 the present, received an email from MyLife that was the same or
18 substantially similar to the any of the emails attached hereto as
Exhibits A-E.

19 Excluded from the Class are MyLife and its subsidiaries and affiliates; all persons who make a
20 timely election to be excluded from the Class; governmental entities; and the judge to whom this
21 case is assigned and any immediate family members thereof.

22 30. Certification of Plaintiff’s claims for classwide treatment is appropriate because
23 Plaintiff can prove the elements of her claims on a classwide basis using the same evidence as
24 would be used to prove those elements in individual actions alleging the same claims.

25 31. **Numerosity – Federal Rule of Civil Procedure 23(a)(1).** The members of the
26 class are so numerous that individual joinder of all Class members is impracticable. On
27 information and belief, there are thousands of consumers who have been affected by MyLife’s
28

wrongful conduct. The precise number of the Class members and their addresses is presently unknown to Plaintiff, but may be ascertained from MyLife's books and records. Class members may be notified of the pendency of this action by recognized, Court-approved notice dissemination methods, which may include U.S. mail, electronic mail, Internet postings, and/or published notice.

32. **Commonality and Predominance – Federal Rule of Civil Procedure 23(a)(2) and 23(b)(3).** This action involves common questions of law and fact, which predominate over any questions affecting individual Class members, including, without limitation:

(a) whether MyLife engaged in the conduct as alleged herein;

(b) whether Plaintiff and the other Class members are entitled to statutory or other forms of damages, and other monetary relief and, if so, in what amount(s); and

(c) whether Plaintiff and other Class members are entitled to equitable relief, including but not limited to injunctive relief.

33. **Typicality – Federal Rule of Civil Procedure 23(a)(3).** Plaintiff's claims are typical of the other Class members' claims because, among other things, all Class members were comparably injured through the uniform misconduct described above.

34. **Adequacy of Representation – Federal Rule of Civil Procedure 23(a)(4).** Plaintiff is an adequate representative of the Class because her interests do not conflict with the interests of the other Class members she seeks to represent; she has retained counsel competent and experienced in complex class action litigation; and Plaintiff intends to prosecute this action vigorously. The Class members' interests will be fairly and adequately protected by Plaintiff and her counsel.

35. **Declaratory and Injunctive Relief – Federal Rule of Civil Procedure 23(b)(2).** MyLife has acted or refused to act on grounds generally applicable to Plaintiff and the other Class members, thereby making appropriate final injunctive relief and declaratory relief, as described below, with respect to Class members as a whole.

1 36. **Superiority – Federal Rule of Civil Procedure 23(b)(3).** A class action is
 2 superior to any other available means for the fair and efficient adjudication of this controversy,
 3 and no unusual difficulties are likely to be encountered in the management of this class action.
 4 The damages or other financial detriment suffered by Plaintiff and the other Class members are
 5 relatively small compared to the burden and expense that would be required to individually
 6 litigate their claims against MyLife, so it would be impracticable for Class members to
 7 individually seek redress from MyLife’s wrongful conduct. Even if Class members could afford
 8 individual litigation, the court system could not. Individualized litigation creates a potential for
 9 inconsistent or contradictory judgments, and increases the delay and expense to all parties and
 10 the court system. By contrast, the class action device presents far fewer management difficulties,
 11 and provides the benefits of single adjudication, economy of scale, and comprehensive
 12 supervision by a single court.

13 **VI. CLAIMS ALLEGED**

14 **COUNT I**

15 **Violation of California Business & Professions Code § 17529 *et seq.*** 16 **(On Behalf of the Class)**

17 37. Plaintiff incorporates by reference the allegations contained in Paragraphs 1-36 as
 18 though fully set forth herein.

19 38. Section 17529 *et seq.* of the California Business & Professions Code makes it
 20 unlawful “for any person or entity to advertise in a commercial e-mail advertisement either sent
 21 from California or sent to a California electronic mail address” if “the email advertisement has a
 22 subject line that a person knows would be likely to mislead a recipient, acting reasonably under
 23 the circumstances, about a material fact regarding the contents or subject matter of the message.”

24 39. Defendant violated the California Anti-Spam Law by sending unsolicited
 25 commercial email advertisements with subject lines that Defendant knew were reasonably likely
 26 to mislead the recipient as to one or more material facts regarding the contents or subject matter
 27 of its email advertisements.
 28

- 1 B. An injunction preventing Defendant from engaging in the unlawful practices and
2 statutory violations asserted herein;
3 C. An Order awarding the maximum allowable statutory damages arising from
4 Defendant's unlawful conduct as described herein;
5 D. An Order awarding reasonable attorneys' fees and costs pursuant to applicable state
6 law; and
7 E. Such further relief as this Court deems just and proper.

8 Dated: January 22, 2015

Respectfully submitted,

9 /s/ Todd C. Atkins

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21 Counsel for Plaintiff and the Proposed
22 Putative Class

23 **Pro hac vice* admittance to be sought

24
25 4838-0133-6089, v. 4

EXHIBIT A

----- Forwarded message -----

From: **MyLife Connection Updates** <mylife@mail.mylife.com>

Date: Wed, Feb 26, 2014 at 5:08 PM

Subject: A 26-year old female viewed your public info

To: Samantha Ellison [REDACTED]

Get latest news on friends and family

Your Public Information is Exposed

Samantha Ellison, [REDACTED]
[REDACTED]

[view and remove](#)

Welcome [REDACTED]



Protect Your Personal Information



MyLife found 5 or more sites exploiting your information.

[Click here to view and remove.](#)

Who's Viewing Your Public Info



Kerri, Lenox, IA
[Find out more](#)



Finding My Kids After 23 Years

I was shocked to find out that the 2 people looking for me were the daughters I abandoned 23 years ago. [Read more](#)



How to Protect Your Kids From Cyberbullying

Tips on how to prevent your child from being bullied online or worse. [Read more](#)





Someone Age 51, Los Angeles, CA
Find out who

[View All](#)

Who's Searching for You on Google



Someone on Feb-2014 *NEW!*
Find out more

[View all](#)

Looking for Love?



Take the quiz to find your best matches



Find singles near you

Stop Missing What's Important

Connect with Facebook to see all of your important conversations in one place.



Connect with us



Download our free apps

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The 10 Cities with the Most Pride

From Miami to Honolulu and every town in between, people in these cities have the most pride. [Learn more](#)

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EXHIBIT B

----- Forwarded message -----

From: **MyLife Connection Updates** <mylife@mail.mylife.com>

Date: Thu, Mar 6, 2014 at 1:39 PM

Subject: 6 people are tracking you online; keeping kids safe on the internet

To: Samantha Ellison [REDACTED]

Get latest news on friends and family

Your Public Information is Exposed

Samantha Ellison, [REDACTED]
[REDACTED]

[view and remove](#)

Welcome [REDACTED]



Protect Your Personal Information



MyLife found 5 or more sites exploiting your information.

[Click here to view and remove.](#)

Who's Viewing Your Public Info



Kerri, Lenox, IA

[Find out more](#)



Keeping Your Kids Safe on the Internet

Tips for protecting your kids online — even if you're not computer savvy. [Read more](#)



How a Class Reunion Changed My Son's Life

When I began using MyLife to find old classmates for a reunion, I never dreamed what it would lead to. [Read more](#)





Someone Age 51, Los Angeles, CA
Find out who

[View All](#)

Who's Searching for You on Google



Someone from Mountain View, CA
Find out more

[View all](#)

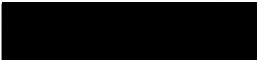


How to Clean Up Your Online Identity

Have you Googled yourself lately? You might be surprised by what you find. [Learn more](#)

Looking for Love?



Take the quiz to find your best matches
in 

[Find singles near you](#)

Stop Missing What's Important

Connect with Facebook to see all of your important conversations in one place.



Connect with us



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[▶ App Store](#)

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EXHIBIT C

----- Forwarded message -----

From: **MyLife Connection Updates** <mylife@mail.mylife.com>

Date: Thu, Mar 13, 2014 at 12:58 PM

Subject: 6 people are viewed your public info; Your address and email are exposed; what does your selfie say about you

To: Samantha Ellison [REDACTED]

Get latest news on friends and family

Your Public Information is Exposed

Samantha Ellison, [REDACTED]
[REDACTED]

[view and remove](#)

Protect Your Personal Information



MyLife found 4 sites exploiting your information.

[Click here to view and remove.](#)

Welcome [REDACTED]



Who's Viewing Your Public Info



Kerri, Lenox, IA

[Find out more](#)



My Selfies, Myself

Ellen DeGeneres's Oscar selfie set new social media records. Are you a selfie taker and what do your selfies say about you? [Read more](#)



10 Best Cities for Food Lovers

Find out if you live in one of the top 10 mid-sized cities for food lovers. [Read more](#)



Someone Age 51, Los Angeles, CA
Find out who

[View All](#)



A MyLife Love Story

My story started almost 50 years ago when I was only 16. That's when I met my first love. [Learn more](#)

Who's Searching for You on Google



Someone from Mountain View, CA
Find out more

[View all](#)

Looking for Love?



Take the quiz to find your best matches in Highland Park, IL

[Find singles near you](#)

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Connect with us



Download our free apps

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[App Store](#)

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EXHIBIT D

----- Forwarded message -----

From: **MyLife Connection Updates** <mylife@mail.mylife.com>

Date: Thu, Mar 20, 2014 at 3:38 PM

Subject: A 26-year old Female viewed your public info; a matter of life and death

To: Samantha Ellison [REDACTED]

Get latest news on friends and family

Welcome [REDACTED]



Finding Mom—A Matter of Life and Death

My sister and I always knew we were adopted, but suddenly it became critical that we find our birth mom. [Read more](#)

4 Sites are Exposing Your Personal Information

- ✓ Your Address
- ✓ Your Phone
- ✓ Your Email
- ✓ Your Family



[VIEW AND REMOVE](#)



The Dangers of Keeping Secrets

We don't keep secrets as much as they keep us—prisoner. [Read more](#)

Who's Viewing Your Public Info



Kerri, Lenox, IA
[Find out more](#)





Someone Age 51, Los Angeles, CA
Find out who

[View All](#)

See Who Googled You Recently



Someone from Mountain View, CA
Find out more

[View all](#)

Looking for Love?



Take the quiz to find your best matches

[Find singles near you](#)

Stop Missing What's Important

Connect with Facebook to see all of your important conversations in one place.



[CONNECT WITH FACEBOOK](#)

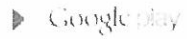


How to Create a Positive Online Identity

Just like having no credit can hurt your chances for a loan, having no online identity could hurt your chances for a job, or even a date. [Learn more](#)

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[Connect with us](#)



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EXHIBIT E

----- Forwarded message -----

From: **MyLife Connection Updates** <mylife@mail.mylife.com>

Date: Thu, Mar 27, 2014 at 3:00 PM

Subject: A 26-year old Female viewed your public info; baby left at the hospital

To: Samantha Ellison [REDACTED]

Get latest news on friends and family

Welcome [REDACTED]



4 Sites Are Exposing Your Personal Information

- ✓ Your Address
- ✓ Your Phone
- ✓ Your Email
- ✓ Your Family



[VIEW AND REMOVE](#)

Who's Viewing Your Public Info



Kerri, Lenox, IA
[Find out more](#)

Someone Age 51, Los Angeles, CA



Baby Left at the Hospital

My birth mom left me right after I was born, and I've been looking for her for 25 years.
[Read more](#)



How to Clean Up Your Online Identity

Have you Googled yourself lately? You might be surprised by what you find. [Learn more](#)



Find out who

[View All](#)

See Who Googled You Recently



Someone from Mountain View, CA
[Find out more](#)

[View all](#)

Looking for Love?



Take the quiz to find your best matches

[Find singles near you](#)

Stop Missing What's Important

Connect with Facebook to see all of your important conversations in one place.



CONNECT WITH FACEBOOK



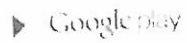
Is Technology Turning Kids into Cyber-Addicts?

How can we help our kids get the most out of tech without becoming addicts? [Read more](#)



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[Connect with us](#)



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